

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

SATYAJIT SANYAL,

Plaintiff,

v.

Case Number: 1:14cv960  
JCC/TCB

TOYOTA MOTOR SALES, U.S.A. INC.

Defendant.

**GEICO'S OBJECTION TO SUBPOENA DUCES TECUM**

COMES NOW GEICO, by counsel, pursuant to Rule 45 of the Federal Rules of Civil Procedure, and files this, its written objection to a subpoena duces tecum served on it by counsel for Toyota Motor Sales, U.S.A. Inc., and states as its grounds as follows:

1. GEICO was served with a subpoena duces tecum by defense counsel requesting that GEICO, "produce all documents and/or records including but not limited to:

1. A complete copy of the claim file for Claim # 028561650-0101-026 for an accident on July 10, 2012 for your insured, Satyajit Sanyal, 12905 Centre Park Circle, Herndon VA, License # A65307469, DOB-07/31/1972 and the insured vehicle a 2011 Toyota Camry, VIN # 4T1BF3EK9BU658720, including but not limited to:

All photographs (in color), diagrams, witness statement, (written or audiotaped) estimates, releases, settlement documents, adjuster's reports/notes and or coverage or policy details."

GEICO is not a party to this litigation but issued a policy of insurance to the plaintiff, Satyajit Sanyal. The subpoena duces tecum served on GEICO is overly broad to the extent that it

calls for information that constitutes GEICO's work product, is privileged, contains proprietary information and/or mental impressions of GEICO's employees or agents.

GEICO  
By Counsel

\_\_\_\_\_/s/\_\_\_\_\_  
Michael Joshi, Esquire VSB # 25502  
Kearney, Freeman, Fogarty & Joshi, PLLC  
4085 Chain Bridge Road, Suite 500  
Fairfax, Virginia 22030  
(703) 691-8333  
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Counsel for Defendant  
[mjoshi@kffjlaw.com](mailto:mjoshi@kffjlaw.com)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 27<sup>th</sup> day of March, 2015, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Satyajit Sanyal  
11654 Plaza America Drive, #622  
Reston, Virginia 20190  
Plaintiff, Pro se

Paul J. Day, Esq.  
DLA Piper, LLP  
The Marbury Building  
6225 Smith Avenue  
Baltimore, Maryland 21209  
Counsel for Defendant

\_\_\_\_\_/s/\_\_\_\_\_  
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